

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**SHAVADA WHEELER, Individually  
and for Others Similarly Situated,  
Plaintiff,**

v.

**vTECH HEALTHCARE, INC.,  
Defendant.**

**Case No.: 1:22-cv-561 (PTG)**

**JOINT STIPULATION OF DISMISSAL**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Shavada Wheeler and Defendant vTech Healthcare, Inc., through counsel, hereby stipulate to the dismissal of the above captioned matter with prejudice. Parties have agreed that Defendant shall make payment to Plaintiff in the amounts of \$19,971.90 in full satisfaction of all claims Plaintiff has against Defendant. Parties further agree that Defendant shall pay \$29,002.24 in attorneys' fees and costs within 30 days of the entry of judgment and dismissal by the court. No class or collective has been certified in this matter. Parties agree this a full satisfaction of this matter and there are no other associated damages, fees, or costs.

Dated: July 27, 2022

Respectfully submitted,

/s/ Scott Brady

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 27, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically sends the foregoing via email to:

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